

PROPOSED PROJECT SUMMARY

EES COKE BATTERY, LLC – RIVER ROUGE, WAYNE COUNTY, MICHIGAN

The Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (AQD), is asking for comments from the public on a proposed Permit to Install (PTI) for EES Coke Battery, LLC (EES Coke). The AQD will accept comments on the proposed PTI until the close of the comment period on February 24, 2025. We will review all comments before we make a final decision on the proposal.

WHAT DOES EES CURRENTLY DO?

EES Coke operates an existing coke oven battery at 1400 Zug Island Road in River Rouge. The facility began operation in 1992 and produces metallurgical coke for the iron and steel industry. The battery consists of eighty-five, six-meter high ovens with integral heating systems; a by-product recovery plant; and a coke oven gas flare. It transforms coal into coke by subjecting it to heat and pressure.

WHAT IS EES COKE PROPOSING TO DO?

EES Coke LLC has requested to install a secondary screener and associated equipment at their existing facility. The purpose of the secondary screener is to process coke at this facility instead of processing it at another facility on Zug Island. This project would increase emissions of particulate matter (PM) by 1.6 tons per year (tpy), particulate matter less than 10 microns in diameter (PM10) by 0.82 tpy, and particulate matter less than 2.5 microns in diameter (PM2.5) by 0.23 tpy.

If constructed, the proposed project will consist of the following equipment:

- A secondary coke screener to sift the coke.
- A loading bin underneath the secondary screener.
- Conveyors to transport coke.
- A sump hopper for loading coke.

To limit emissions from the proposed process, the secondary coke screener will be enclosed in a

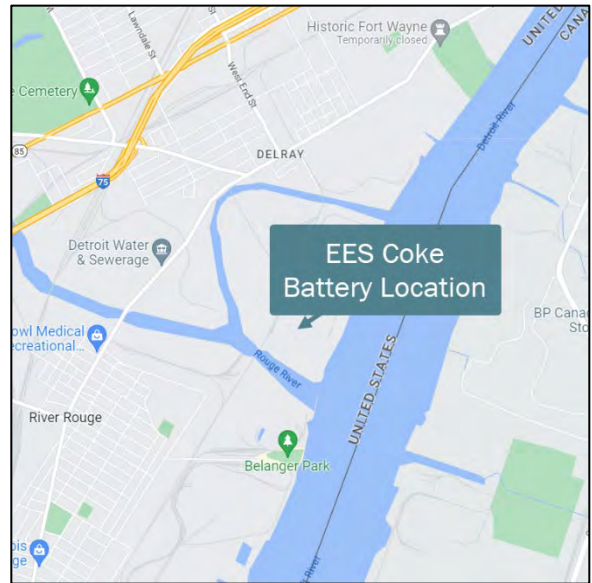


Figure 1: EES Coke Battery Location

building and a special foam will be applied to the coke to prevent it from becoming airborne.

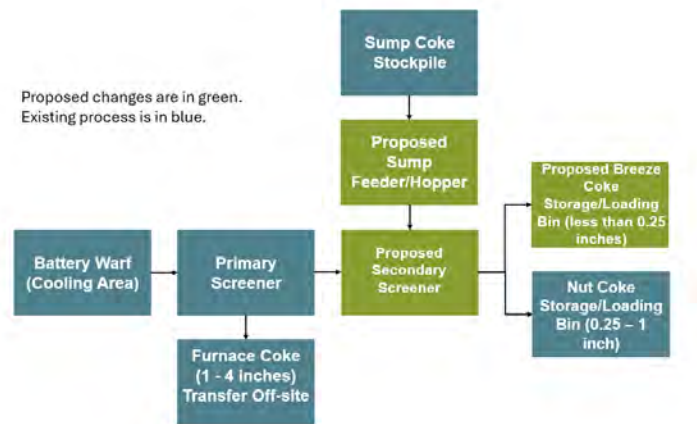


Figure 2 shows EES Coke’s existing process in blue and the proposed equipment in green.

Figure 2: Process Flow Diagram

WHAT IS A PTI AND WHY IS ONE NEEDED?

A PTI, commonly known as an air use permit, is required for projects that involve installing, constructing, reconstructing, relocating, or modifying most processes or process equipment that emit, or may emit, air contaminants, such as the secondary screener EES Coke is proposing to install.

The AQD has reviewed the application and written proposed permit conditions to make sure the project complies with all applicable air rules and regulations.

WHY IS EES COKE GOING OUT TO PUBLIC COMMENT?

There has been historical public interest in EES Coke. The AQD has determined that the public should have the opportunity to comment on the proposed permit conditions.

WHAT IS THE CURRENT AIR QUALITY IN THE AREA?

The United States Environmental Protection Agency (USEPA) has developed health-protective standards for specific air pollutants. These standards are called the National Ambient Air Quality Standards (NAAQS).

There are NAAQS for [some pollutants](#), including sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide, PM₁₀, PM_{2.5}, ozone and lead.

Poor air quality from high levels of pollution can cause health problems. The NAAQS are developed from research studies and set at levels to protect public health. This includes health protection for sensitive groups, like those with heart and lung problems.

The facility is located in the portion of Wayne County, Michigan which is meeting all of the NAAQS except for SO₂. The AQD operates 11 [air monitoring station\(s\)](#) in Wayne County, 7 of which are in the City of Detroit and within 5 miles of EES Coke. The closest monitoring station is the Detroit SW station

located 1.25 miles north of EES Coke. The Detroit SW station measures NO₂, PM₁₀, PM_{2.5}, SO₂, volatile organic compounds (VOC), metals, black carbon, and carbonyls. The purpose of the air monitoring stations is to assess the regional or area-wide air quality and is not used to determine if a specific source is in compliance with their air permit.

WHAT DO I REALLY NEED TO KNOW ABOUT THE PROPOSED PERMIT?

The proposed permit has specific requirements EES Coke would have to follow if the permit is approved. Key areas you may be interested in, or that you may want more details on, include:

- **Emission limits** – The amount of specific air pollutants allowed to be released.
- **Material limits** - The maximum amount of coke allowed to be processed on an hourly and annual basis.
- **Process restrictions** – EES Coke must develop and implement a fugitive dust control plan, and a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) to ensure proper operation and maintenance of the screener.
- **Operational restrictions** – EES Coke must operate the screener within an enclosed building. Also, EES Coke may not operate the screener without an associated spray foam application system also being operated.
- **Monitoring and Recordkeeping** – Must maintain appropriate records to show compliance with their permit.

WILL AIR QUALITY STANDARDS BE MET?

A computer model was used to determine the expected impacts of the emissions from the proposed project on the air quality in the area surrounding EES Coke. This type of computer model is called an air dispersion model and considers many factors like the amount and type of emissions, wind directions, weather conditions, local geography, and other factors.

The model showed that the expected impacts of the emissions, plus the existing monitored levels, are less than the applicable NAAQS for PM10 and PM2.5.

Michigan has developed health-based screening levels for additional pollutants referred to as toxic air containments (TAC) under its Air Toxics rules. The proposed TAC emissions from the project would comply with the AQD’s health-based screening levels.

WAS ENVIRONMENTAL JUSTICE CONSIDERED FOR THIS PROJECT?

Part of opening a proposed permit for public comment involves evaluating the community around the proposed project, including environmental justice, translation, and other community specific concerns. Full details of how we consider this in permitting can be found in [“Including Environmental Justice: Air Permitting in Michigan”](#).

The language evaluation looks at the number of people who speak English “less than very well” within a 1-mile radius of the proposed project’s location. This is required by EGLE’s [Limited English Proficiency Plan](#) using an environmental justice screening tool like USEPA’s [EJSCREEN](#). The evaluation found that translation into Spanish may be helpful.

WHAT ABOUT NOISE, TRAFFIC, AND ZONING?

The AQD evaluates the potential air emissions from the proposed facility to determine if they comply with the air quality rules and regulations. The AQD does not have authority to regulate noise or traffic outside the facility and does not have authority to evaluate compliance with local zoning requirements.

WHERE CAN I FIND MORE INFORMATION?

Other information, like the [Technical Fact Sheet](#) and the [proposed permit conditions](#) can be found at Michigan.gov/EGLEAirPublicNotice, under “Applications Open for Comment.” In addition, EES

Coke’s application and important correspondence with the AQD can be found under PTI application No. APP-2024-0157 on the [Other Applications of Interest](#) page.

The Technical Fact Sheet has additional details about the project and how it will meet the rules and regulations, such as:

- A summary of the reviews completed by AQD staff.
- How the project will affect air quality and public health.
- A summary of what the proposed permit would require EES Coke to do.
- A summary of the allowed emissions included in the proposed permit.
- The rules and regulations that apply to the proposed project.
- Example emission calculations.

AQD staff can provide additional information upon request.

SUMMARY:

The AQD has reviewed the PTI application submitted by EES Coke and prepared a proposed permit. If the proposed permit is approved, it will ensure the facility meets the applicable air quality requirements. Therefore, we recommend approving the proposed permit.

However, before the AQD acts on the PTI application, we are requesting comments from the public. The AQD will review all comments received during the public comment period and public hearing, then decide whether to approve, approve with modifications or deny the proposed PTI application. If approved, the AQD may decide to add or change permit conditions based on the comments received.

WHO CAN I CONTACT?

For more information about the proposed permit, please contact Grace Knauss, AQD, at: KnaussG@Michigan.gov or 517-643-6174.

WHAT PUBLIC COMMENTS CAN EGLE CONSIDER?

All comments from the public are important. But it is also important to know the law is clear about what we can and cannot consider when we make our decision. Some examples are below.

What we can consider	What we can't consider
<ul style="list-style-type: none"> ✓ Technical mistakes in the review ✓ Grammar and spelling mistakes ✓ Other rules the action should consider and why ✓ Why the action will not follow the rules 	<ul style="list-style-type: none"> • Air, land, or water issues not part of the project • Indoor air pollution • Traffic • Noise and lights • Zoning issues • Anything unrelated to the project

HOW CAN I MAKE A COMMENT?

The AQD welcomes comments from the public during the comment period. Before commenting, it is a good idea to “[View an Example](#)” of how to do it. You may also want to read the “[Public Hearings - What you should know](#)” card.

Documents pertaining to EES Coke can be found at: Michigan.gov/EGLEAirPublicNotice

Comments must be received by **February 24, 2025**.



Via email

EGLE-AQD-PTIPublicComments@Michigan.gov



Via US mail

Permit Section Manager, EGLE, AQD
P.O. Box 30260
Lansing, MI 48909-7760



Via voicemail

by calling 517-284-0900



At the In-Person/Virtual Public Hearing,

The in-person public hearing on February 12, 2025, starting at 5:30 p.m. at the River Rouge City Hall, 10600 W. Jefferson Avenue, River Rouge, Michigan. The informational session and hearing will also be broadcast. The public may join the broadcast at: <https://bit.ly/4eeglKA>. Call in at 636-651-3142 and us conference code 374288. EGLE staff will be available to answer questions and provide assistance if needed.

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